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Amdt date April 11, 2006
Reply to Office action of January 12, 2006

<u>Amendments to the Drawings:</u>

The attached sheet of drawings includes changes to Fig 7. This sheet, which includes Fig. 7, replaces the original sheet including Fig. 7.

Attachment: Replacement Sheet

                           Annotated Sheet Showing Changes

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REMARKS/ARGUMENTS

Claims 1-4, 7-9, 12-14, 18-19, 24-26, 29-31, 35-38, 41-43, 46-49, and 52-55 were pending in this application when last examined by the Examiner. Claims 56-67 have been added. The new claims find full support in the original specification, claims, and drawings. No new matter has been added. Applicant respectfully requests reconsideration and an early indication of allowance of the now-pending claims 1-4, 7-9, 12-14, 18-19, 24-26, 29-31, 35-38, 41-43, 46-49, and 52-67.

The specification and FIG. 7 of the drawings have been amended to correct certain typographical errors in the reference numbers. Entry of the amendments are respectfully requested.

As an initial matter, Applicant thanks the Examiner for conducting a telephone interview with the undersigned on April 6, 2006. During the interview claim 1 was discussed with reference to Cascio et al. (U.S. Patent Application Publication No. 2002/0091818) and Meltzer et al. (U.S. Patent Application Publication No. 2002/0165872).

Claims 1-4, 7-9, 13, 18-19, 24-26, 31, 35-38, 41-43, 46, 48, and 52-55 are rejected under 35 U.S.C. 103(a) as being unpatentable over Cascio in view of Meltzer. Claims 12, 29, and 46 are rejected under 35 U.S.C. 103(a) as being unpatentable over Cascio in view of Meltzer in further view of Walsh et al. (U.S. Patent No. 6,810,429). Claim 49 is rejected under 35 U.S.C. 103(a) as being unpatentable over Cascio in view of Meltzer in further view of Chau et al. (U.S. Patent Application Publication No. 2003/0014397). Applicant respectfully traverses these rejections.

As discussed during the telephone interview, claim 1 expressly recites a "personality document" and a "behavior document." Claim 1 further recites "generating, under control of the computer, a tree-based representation of the incoming document." The "tree-based" representation is then used for "testing the tree-based representation of the incoming document based on the personality document for recognizing the incoming document." Neither Cascio nor Meltzer teach or suggest these limitations.

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Cascio is simply directed to transforming an incoming data stream into an XML document. Cascio discloses rules that are used to specify the target patterns of the data to be extracted from an incoming data stream. Upon a match between data in the incoming data stream and a target rule, an output document expressed in XML is created. (See, Abstract). The Examiner appears to contend that the collection of rules in Cascio is the recited "personality document," and the matching target rule is the recited "behavior document." Applicant respectfully disagrees.

Cascio's collection of rules is not the recited "personality document" because they do not define "a plurality of business operations," and the matching target rule is not the recited "behavior document" because it does not define "a plurality of actions for conducting the associated business operation." Cascio's collection of rules simply defines target patterns of data to be extracted, but does not define any "business operation." (See, Cascio par. 0047). Similarly, Cascio's matching target rule defines the target patterns of data to be extracted, but does not define "a plurality of actions for conducting the associated business operation."

Cascio further fails to teach or suggest "generating . . . a tree-based representation of the incoming document." As such, Cascio cannot teach or suggest "testing the tree-based representation of the incoming document based on the personality document for recognizing the incoming document" as is recited in claim 1.

The Examiner acknowledges that Cascio fails to teach "generating . . . a tree-based representation of the incoming document," but relies on Meltzer to make up for this deficiency. Specifically, the Examiner relies on paragraph 096 of Meltzer which discloses that a "tree builder takes a stream of XML events and generates a tree representation of the underlying document." (Emphasis added). Based on this teaching, the Examiner contends that a person of skill in the art would be motivated to modify the teachings of Cascio with the teachings of Meltzer so as to generate a tree based representation of the incoming document in Cascio. Applicant respectfully disagrees.

Meltzer requires an XML stream as the input for creating the tree representation. Thus, in Meltzer's system, the XML stream is a precondition for creating the tree representation.

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However, the Examiner's modification of Cascio would require that a tree-based representation be generated before the XML document is generated because the Examiner proposes using Meltzer's teaching in the middle of Cascio's process of generating the XML document. Applicant respectfully submits that if a person of skill in the art were to combine the teachings of Cascio and Meltzer, he would instead be motivated to first generate an XML document based on the teachings of Cascio, and then apply Meltzer to generate a tree representation based on the generated XML document. Accordingly, the Examiner has not established a *prima facie* case of obviousness for claim 1, and claim 1 is in condition for allowance.

Independent claims 7, 18, 24, 35, and 41 include limitations that are similar to the limitations of claim 1 which make claim 1 allowable. Accordingly, claims 7, 18, 24, 35, and 41 are also in condition for allowance. Independent claims 15, 32, 50, and 51 have been canceled.
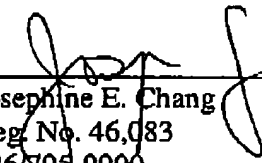
Claims 2-4, 8-9, 12-14, 19, 25-26, 29-31, 36-38, 42-43, 46-49, and 52-55 are also in condition for allowance because they depend on an allowable base claim, and for the additional limitations that they contain.

Claims 55-67 are new in this application. Claims 55-67 are also in condition for allowance because they depend on an allowable base claim, and for the additional limitations that they contain. Specifically, claims 56, 58, 60, 62, 64, and 66 add the limitation that the personality document includes "criteria information," and that the testing includes "testing the tree-based representation of the incoming document for a match based on the criteria information" which is not taught nor suggested by any of the cited references. Claims 57, 61, and 65 add the limitation of "translating the incoming document having a first XML representation into a document having a second XML representation" which is not taught nor suggested by the cited references. Claims 59, 63, and 67 similarly recite that "the incoming document is an XML document having a first XML representation" and the working document is an XML document having a second XML representation" which is also not taught nor suggested by the cited references. Thus, claims 55-67 are also in condition for allowance for these additional limitations.

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In view of the above amendments and remarks, reconsideration and an early indication of allowance of the now-pending claims 1-4, 7-9, 12-14, 18-19, 24-26, 29-31, 35-38, 41-43, 46-49, and 52-67 are respectfully requested.

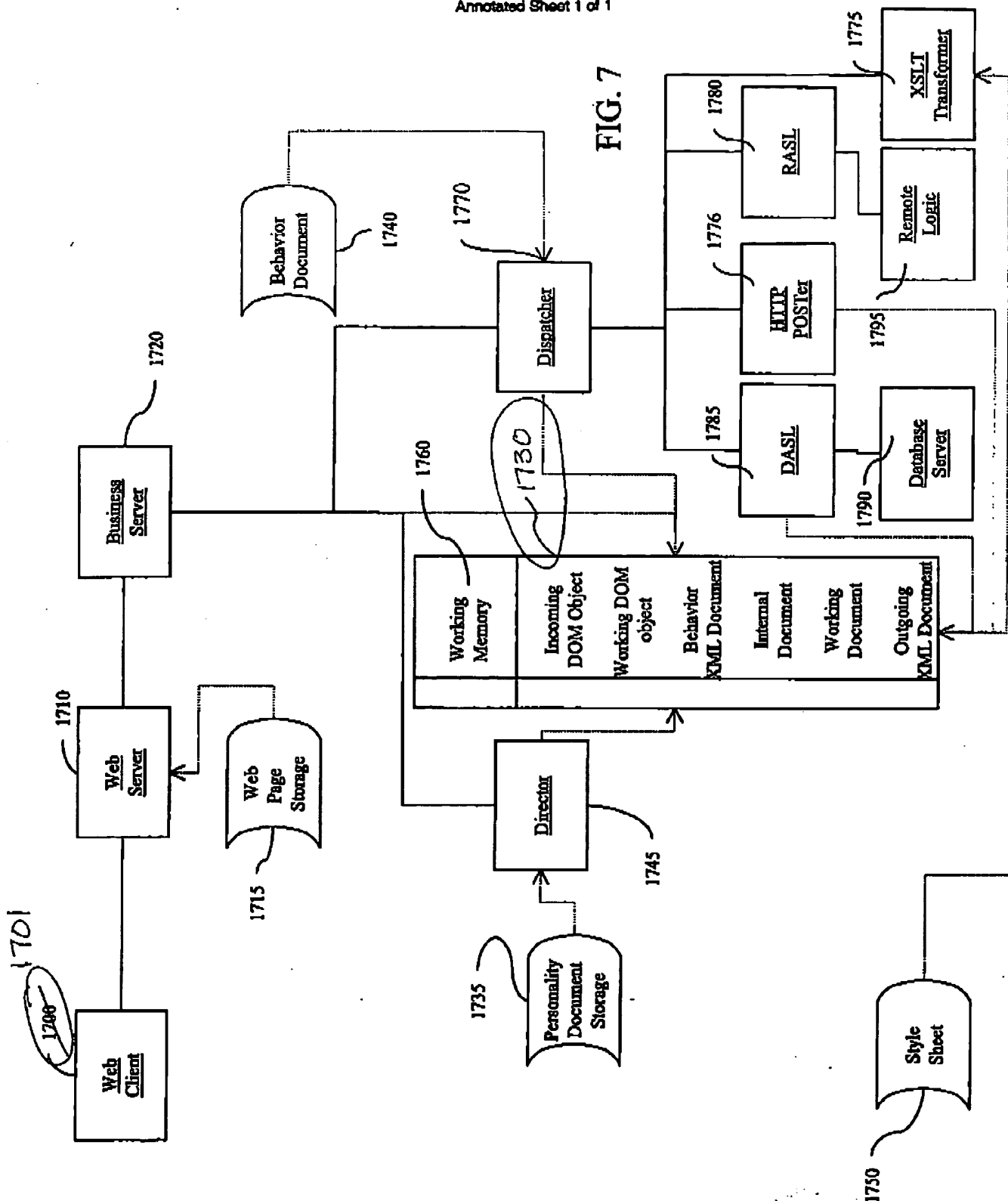Respectfully submitted,

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PAGE 22/24 * RCVD AT 4/11/2006 5:00:59 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-3/5 * DNIS:2738300 * CSID:626 577 8800 * DURATION (mm-ss):06-12

FIG. 7